Mr. Jim Stanley
Jefferson Smurfit Corporation (U.S.)
102 West Superior Street
Fort Wayne, Indiana 46802

Re: 003-10873-00033
First Minor Revision to
FESOP 003-5349-00033

Dear Mr. Stanley:

Jefferson Smurfit Corporation (U.S.) was issued a FESOP (F003-5349-00033) on December 9, 1996 for the manufacturing of paperboard container. A letter requesting changes to this FESOP due to the construction of a new press was received on April 19, 1999. Pursuant to the provisions of 326 IAC 2-8-11.1(d)(5) a minor FESOP revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction of the following equipment:

One (1) new sheet fed non-heatset offset lithographic press (P-140) with a capacity of 547 feet per minute, printing width of 55.12 inches to replace existing Press #110.

Pursuant to 326 IAC 2-8-11.1, the FESOP shall be revised to incorporating the minor permit revision. The additional press P-140 is incorporated in Section A.2 item (b) Page 4 of 27 and Section D.2 page 23 of 27 of the FESOP as follows (changes are bolded and deletion are strike-through fro emphasis):

A.2 Emission Units and Pollution Control Summary

(b) Three (3) sheet-fed (non-heatset) printing presses. They are identified as follows:

(1) P-1 maximum capacity of 270 feet per minute
maximum print width of 56 inches
no control equipment

(2) P-2 maximum capacity of 500 feet per minute
maximum print width of 40 inches
no control equipment

(3) P-3* maximum capacity of 583 feet per minute
maximum print width of 40 inches
no control equipment

(c) Proposed one (1) sheet-fed (non-heatset) printing press:

(1) P-140 maximum capacity of 547 feet per minute
maximum print width of 55.12 inches
no control equipment
This press will replace press P-1

Each press exhausts via a hood and fan with a corresponding identification number.

* This press will replace the existing press P-3 which has a maximum capacity of 220 feet per minute. Since the replacement has a greater capacity, it was incorporated into this permit and used in the emission calculations. If construction of this facility has not begun within 18 months of the date of issuance of this permit a construction permit will be required.

SECTION D.2 FACILITY OPERATION CONDITIONS

(b) Three (3) sheet-fed (non-heatset) printing presses. They are identified as follows:
(1) P-1 maximum capacity of 270 feet per minute
maximum print width of 56 inches
no control equipment

(2) P-2 maximum capacity of 500 feet per minute
maximum print width of 40 inches
no control equipment

(3) P-3* maximum capacity of 583 feet per minute
maximum print width of 40 inches
no control equipment

(c) Proposed one (1) sheet-fed (non-heatset) printing press:
(1) P-140 maximum capacity of 547 feet per minute
maximum print width of 55.12 inches
no control equipment
This press will replace press P-1

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 8-1-6]

D.2.1 Volatile Organic Compounds (VOCs)

(a) The volatile organic compounds ~~delivered to the applicators plus the amount of VOCs used for~~ **input including the usage of wash-up or** clean-up ~~shall not exceed 22 tons per press per 12 consecutive months~~. **solvents from presses P-1, P2, and P3** shall ~~not exceed 22 tons~~ **each be restricted in order to limit the VOC emissions to less than 25 tons** per press per **12-month period rolled on a monthly basis** ~~consecutive months~~. The volatile content of each of the printing ink shall have a flash off of 5% ~~emission factor to obtain VOC emissions~~; **each varnish and aqueous coatings shall have a flash off of 60%, each of the wash-up and clean-up solvents shall have a flash off of 100%.** ~~The VOC content of each of the solvents, washes and solutions shall be multiplied by 100% emission factor to obtain VOC emissions. Compliance with this condition will render the requirements of 326 IAC 8-1-6 (VOC emissions - Best Available Control Technology Rule) not applicable. This will also render the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.~~

(b) The VOC input including the usage of wash-up or clean-up solvents from the proposed P-140, shall be restricted in order to limit the VOC emissions to less than 25 tons per 12-month period rolled on a monthly basis. The volatile content of each of the printing ink shall have a flash off of 5%; each varnish and aqueous coatings shall have a flash off of 60%, each of the wash-up and clean-up solvents shall have a flash off of 100%.

During the first twelve (12) months of operation, the input of VOC including the usage of wash-up or clean-up solvents shall be restricted such that the total usage divided by the accumulated months of operation shall not result in VOC emissions greater than a total of 25 tons per year divided by twelve (12) months which equals less than 2.08 tons per month.

(c) Compliance with Sections (a) and (b) of this condition shall render the requirements of 326 IAC 8-1-6 (General Reduction Requirements) and 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.

D.2.2 Hazardous Air Pollutants (HAPs)
The amount of any single HAP ~~delivered to the applicators on the presses plus the amount of any single HAP used~~ **input including any HAP used for wash-up or clean-up from all presses** ~~shall not exceed 9 tons per 12 consecutive months~~. **and from the insignificant activities shall be restricted in order to limit the single HAP emissions to less than 10 tons per 12-month period, rolled on a monthly basis**. The amount of any combination of HAPs ~~associated with the clean-up of the presses shall not exceed 22 tons per 12 consecutive months.~~ **input including the usage of wash-up or clean-up from all presses and from the insignificant activities shall be restricted in order to limit the combined HAPs emissions to less than 25 tons per 12-month period, rolled on a monthly basis**. Therefore the requirements of 326 IAC 2-7 (Part 70) are not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Volatile Organic Compound (VOC) Usage
The Permittee shall maintain records at the source of the materials used that contain any VOCs. **This shall include the VOC usage from presses P-1, P-2, P-3 including press P-140.** The records shall be complete and sufficient to establish compliance with the VOC emission limits established in this permit. The records shall contain a minimum of the following:

(a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The VOC content (weight percent) of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.2.4 Hazardous Air Pollutant (HAP)
The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP emission limits that are established in this permit. The records shall contain a minimum of the following:

(a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The HAP content (weight percent) for each material used;

(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.2.5 Quarterly Reporting

A quarterly summary to document compliance with operation conditions number D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of the issued FESOP using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. The quarterly report forms are to document the VOC, combined HAPs and single HAP **emitted by the presses** ~~use as delivered to the applicators on the associated clean-up of the presses.~~

Existing Reporting Form on page 27 of 27 of the FESOP was revised to include the new press P-140, and as requested by the source, the VOCs and HAPs will have separate reporting forms.

Subsequent conditions are renumbered accordingly.

All other conditions of the FESOP shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for (Aida De Guzman) or extension (3-4972), or dial (317)233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File -Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section
Administrative and Development - Janet Mobley
Technical Support and Modeling

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
Office of Air Quality

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

Jefferson Smurfit Corporation (U.S.)
102 West Superior Street
Ft. Wayne, Indiana 46802

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F003-5349-00033	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: December 9, 1996

1st Administrative Amendment: 003-8283	Issuance Date: April 1, 1997
Name Change: 003-10531	Issuance Date: March 9, 1999

1st Minor FESOP Revision No: 003-10873	Pages Affected: 4, 23, 24, 27 Pages Added: 27a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(c)]
The Permittee owns and operates a paperboard container company.

Responsible Official:	Jim Stanley
Source Address:	102 West Superior Street, Ft. Wayne, Indiana 46802
Mailing Address:	102 West Superior Street, Ft. Wayne, Indiana 46802
SIC Code:	2657
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]
The stationary source consists of the following emission units and pollution control devices:

(a) Four (4) natural gas boilers. They are identified as follows:

(1) B 1 - maximum capacity of 4.2 million Btu per hour with no control equipment; it exhausts to stack B1.
(2) B 2/3 - maximum capacity of 5.25 million Btu per hour with no control equipment; it exhausts to stack B2/3.
(3) B 4/5A - maximum capacity of 4.2 million Btu per hour with no control equipment; it exhausts to stack B4/5.
(4) B 4/5B - maximum capacity of 4.2 million Btu per hour with no control equipment; it exhausts to stack B4/5.

(b) Three (3) sheet-fed (non-heatset) printing presses. They are identified as follows:

(1) P-1 maximum capacity of 270 feet per minute
maximum print width of 56 inches
no control equipment

(2) P-2 maximum capacity of 500 feet per minute
maximum print width of 40 inches
no control equipment

(3) P-3* maximum capacity of 583 feet per minute
maximum print width of 40 inches
no control equipment

(c) Proposed one (1) sheet-fed (non-heatset) printing press:

(1) P-140 maximum capacity of 547 feet per minute
maximum print width of 55.12 inches
no control equipment
This press will replace press P-1

* This press will replace the existing press P-3 which has a maximum capacity of 220 feet per minute. Since the replacement has a greater capacity, it was incorporated into this permit and used in the emission calculations. If construction of this facility has not begun

SECTION D.2 FACILITY OPERATION CONDITIONS

(b) Three (3) sheet-fed (non-heatset) printing presses. They are identified as follows:
(1) P-1 maximum capacity of 270 feet per minute
maximum print width of 56 inches
no control equipment

(2) P-2 maximum capacity of 500 feet per minute
maximum print width of 40 inches
no control equipment

(3) P-3* maximum capacity of 583 feet per minute
maximum print width of 40 inches
no control equipment

(c) Proposed one (1) sheet-fed (non-heatset) printing press:
(1) P-140 maximum capacity of 547 feet per minute
maximum print width of 55.12 inches
no control equipment
This press will replace press P-1

Emissions Limitations and Standards [326 IAC 2-8-4(1)] [326 IAC 8-1-6]

D.2.1 Volatile Organic Compounds (VOCs)

(a) The volatile organic compounds input including the usage of wash-up or clean-up solvents from presses P-1, P2, and P3 shall **each** be restricted in order to limit the VOC emissions to less than 25 tons per press per 12-month period, rolled on a monthly basis. The volatile content of each of the printing ink shall have a flash off of 5%; each varnish and aqueous coatings shall have a flash off of 60%, each of the wash-up and clean-up solvents shall have a flash off of 100%.

(b) The VOC input including the usage of wash-up or clean-up solvents from the proposed P-140, shall be restricted in order to limit the VOC emissions to less than 25 tons per 12-month period rolled on a monthly basis. The volatile content of each of the printing ink shall have a flash off of 5%; each varnish and aqueous coatings shall have a flash off of 60%, each of the wash-up and clean-up solvents shall have a flash off of 100%.

During the first twelve (12) months of operation, the input of VOC including the usage of wash-up or clean-up solvents shall be restricted such that the total usage divided by the accumulated months of operation shall not result in VOC emissions greater than a total of 25 tons per year divided by twelve (12) months which equals less than 2.08 tons per month.

(c) Compliance with Sections (a) and (b) of this condition shall render the requirements of 326 IAC 8-1-6 (General Reduction Requirements) and 326 IAC 2-7 (Part 70 Operating Permit Program) not applicable.

D.2.2 Hazardous Air Pollutants (HAPs)

The amount of any single HAP input including any HAP used for wash-up or clean-up from all presses and from the insignificant activities shall be restricted in order to limit the single HAP emissions to less than 10 tons per 12-month period, rolled on a monthly basis. The amount of any combination of HAPs input including the usage of wash-up or clean-up from all presses and from the insignificant activities shall be restricted in order to limit the combined HAPs emissions to less than 25 tons per 12-month period, rolled on a monthly basis. Therefore the requirements of 326 IAC 2-7 (Part 70) are not applicable.

Record Keeping and Reporting Requirements [326 IAC 2-8-5(a)(1)]

D.2.3 Volatile Organic Compound (VOC) Usage

The Permittee shall maintain records at the source of the materials used that contain any VOCs. This shall include the VOC usage from presses P-1, P-2, P-3 including press P-140. The records shall be complete and sufficient to establish compliance with the VOC emission limits established in this permit. The records shall contain a minimum of the following:

(a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The VOC content (weight percent) of each material used;

(c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.2.4 Hazardous Air Pollutant (HAP)

The Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP emission limits that are established in this permit. The records shall contain a minimum of the following:

(a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;

(b) The HAP content (weight percent) for each material used;

(c) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable;

D.2.5 Quarterly Reporting

A quarterly summary to document compliance with operation conditions number D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of the issued FESOP using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. The quarterly report forms are to document the VOC, combined HAPs and single HAP emitted by the presses.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 102 West Superior Street, Ft. Wayne, Indiana 46802
FESOP No.: F003-4637-00033
Facility: Lithographic printing presses (P-1, P-2, P-3 and P-140)
Parameter: VOCs
Limit: Less than 25 tons of VOC per press per 12-month period rolled on a monthly basis**.** Sourcewide VOC emissions shall not exceed 100 tons/year

Facility ID	Month	VOC Emitted This Month	VOC Emitted Previous 11 Months	VOC Emitted 12 Month Total
Proposed Press P-140	Month 1			
	Month 2			
	Month 3			
Press P-1	Month 1			
	Month 2			
	Month 3			
Press P-2	Month 1			
	Month 2			
	Month 3			
Press P-3	Month 1			
	Month 2			
	Month 3			
Sourcewide (TOTAL)	Month 1			
	Month 2			
	Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Note: This report shall include a detailed spreadsheet with the raw material usage, showing on how the emissions were derived.

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Jefferson Smurfit Corporation (U.S.)
Source Address: 102 West Superior Street, Ft. Wayne, Indiana 46802
FESOP No.: F003-4637-00033
Facility: Lithographic printing presses (P-1, P-2, P-3 and P-140)
Parameter: HAPs
Limit: Sourcewide Limits
Less than 25 tons of combined HAPs per 12-month period rolled on a monthly basis
Less than 10 tons for any single HAP per 12-month period rolled on a monthly basis

Month	Single HAP Emitted This Month	Single HAP Emitted Previous 11 Months	Single HAP Emitted 12 Month Total	Combined HAPs Emitted This Month	Combined HAPs Emitted Previous 11 Months	Combined HAPs Emitted 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Note: This report shall include a detailed spreadsheet with the raw material usage, showing on how the emissions were derived.

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
OFFICE OF AIR QUALITY

Technical Support Document (TSD) for a Minor FESOP Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Jefferson Smurfit Corporation (U.S.)
Source Location:	102 West Superior Street, Fort Wayne, Indiana 46082
County:	Allen
SIC Code:	2657
Operation Permit No.:	F003-5349-00033
Operation Permit Issuance Date:	December 9, 1996
Minor FESOP Revision No.:	003-10873-00033
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a revision application from Jefferson Smurfit Corporation (U.S.) relating to the operation of the following equipment:

One (1) new sheet fed non-heatset offset lithographic press (P-140) with a capacity of 547 feet per minute, printing width of 55.12 inches to replace existing Press #110.

History

On April 19, 1999, Jefferson Smurfit Corporation (U.S.) submitted an application to the OAQ requesting to add a sheet fed non-heatset offset lithographic press to replace an existing press. Jefferson Smurfit Corporation (U.S.) was issued a FESOP F003-5349-00033 on December 9, 1996.

Existing Approvals

The source was issued FESOP F003-5349-00033 on December 9, 1996. The source has since received the following:

(a) A Name Change No.: 003-10531-00033, issued on March 8, 1999; and
(b) 1st Administrative Amendment No.: 003-8283-00033, issued on April 1, 1997.

Recommendation

The staff recommends to the Commissioner that the Minor FESOP Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 19, 1999. Additional information was received on May 5, 1999, and December 12, 2000.

Emission Calculations

(a) VOC Non-heatset offset Lithographic Press P-140 Emissions:
See Page 1 of 1 TSD Appendix A for detailed emissions calculations

(b) HAPs Non-heatset offset Lithographic Press P-140 Emissions:

THROUGHPUT			
Press ID	MAXIMUM LINE SPEED (FT/MIN)	MAXIMUM PRINT WIDTH (INCHES)	$MMin^2$/YEAR
Press P-140	547	55.12	190166

PRESS P-140						
MATERIAL TYPE	Maximum Coverage ($lb/MMin^2$)	Wt % Glycol Ether	Wt % Ethylene Glycol	Throughput ($MMin^2$/YR)	Glycol Ether Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)
Ink	3	-	-	190166	-	-
Aqueous Coating	4.5	-	-	190166	-	-
Cleaning Solvent	0.00582	-	-	190166	-	-
Fountain Solution	0.1	10%	10%	190166	0.95	0.95

Methodology:
HAP Emissions = Maximum coverage, $lb/MMin^2$ * wt % HAP * Flash Off * Throughput * ton/2000 lb
Flash off = 100%

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	41.99
CO	0.0
NO_x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethylene Glycol	0.95
Glycol Ether	0.95
TOTAL	1.9

Justification for the Level of Approval

The construction and operation of the new press, P-140 will be subject to 326 IAC 2-8-11.1(d)(5) minor permit revision, because the volatile organic compound (VOC) is limited to less than 25 tons per year.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the equipment under this Minor FESOP Revision.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Press P-140	0.0	0.0	0.0	24.0	0.0	0.0	1.09
Total Emissions	0.0	0.0	0.0	24.0	0.0	0.0	1.09

HAP Limit = $\frac{\text{HAPs potential emissions}}{\text{VOC potential emissions}} * \text{VOC limit}$

County Attainment Status

The source is located in Allen County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating

the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) New Source Performance Standards (326 IAC 12) and 40 CFR Part 60:

40 CFR Part 60.430, Subpart QQ-Standards of Performance for the Graphic Arts Industry:
This provision applies to each Publication Rotogravure Printing Press that commences construction after October 28, 1980.

The new Press P-140 is not subject to this NSPS, because it is not a publication rotogravure printing press. It is an Offset Lithographic printing press used in the manufacture of paperboard containers.

(b) There are no other New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

(c) National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63:

40 CFR Part 63.820, Subpart KK - National Emission Standards for the Printing and Publishing Industry: This provision applies to new and existing facilities that are major sources of hazardous air pollutants, at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated.

The new Press P-140 is not subject to this NESHAP, because it is not a rotogravure press nor it is a flexographic printing press, nor it is a major source for HAPs emissions.

(d) There are no other National Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 12) and 40 CFR Part 63 applicable to this facility.

State Rule Applicability

(a) 326 IAC 2-6 (Emission Reporting)
This facility is not subject to 326 IAC 2-6 (Emission Reporting), because the source potential to emit (PTE) VOC is less than 100 tons/yr.

(b) 326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Operations)
This rule applies to packaging rotogravure, publication rotogravure, and flexographic printing sources of which construction commences after November 1, 1980, located anywhere in the state, with potential emissions of twenty-five (25) tons per year or more volatile organic compounds (VOC).

The source is not subject to 326 IAC 8-5-5, because it is not a packaging rotogravure, publication rotogravure, nor flexographic printing source. It is an Offset Lithographic printing operation.

(c) 326 IAC 8 (Volatile Organic Sources)
There are no other 326 IAC 8 rules that apply to this source, because it does not fit to any of the source categories in the rules.

(d) 326 IAC 8-1-6 (General Reduction Requirements)
New facilities as of January 1, 1980, which have potential emissions of 25 tons per year or more, located anywhere in the state which are not otherwise regulated by other provisions of this article 326 IAC 8, shall reduce VOC emissions using best available control technology. To avoid the applicability of this rule, the source requested a limit in the VOC input usage from the Press P-140 to less than 25 tons per year.

(e) 326 IAC 2-4.1-1 (New Source Toxic Control)
This rule is not applicable to the new Press P-140, because it is not a major source of HAPs emissions.

(f) 326 IAC 6-3 (Process Operation PM Allowable Emissions)
This rule is not applicable to the new Press P-140, because it does not emit any particulate matter (PM).

(g) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this Press P-140 shall be subject to the conditions of the attached proposed **Minor FESOP Revision No. 003-10873-00033**.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name:	**Smurfit Stone Container Corp.**
Address City IN Zip:	**102 West Superior St., Fort Wayne, IN 46082**
Minor FESOP Revision:	**003-10873**
Plt ID:	**003-00033**
Reviewer:	**Aida De Guzman**
Date:	**April 30, 1999**

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN)		MAXIMUM PRINT WIDTH (INCHES)	MMin^2/YEAR
Press 140	547		55.12	190166

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Wt. % Water	Weight % Volatiles*	Flash Off %	Throughput (MMin^2/Year)	Emissions (TONS/YEAR)
Ink	3	0	29%	5.00%	190166	**(4.15) 6 = 24.9**
Aqueous Coating	4.5	59%	6%	60.00%	190166	**15.40**
Cleaning Solvent	0.00582	0	100%	100.00%	190166	**0.55**
Fountain Solution	0.1	65%	12%	100.00%	190166	**1.14**
			0%	0.00%	190166	0.00

Total VOC Emissions =	**41.99 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds
NOTE: The proposed press will have six (6) applicators for ink, therefore, the ink emissions is multiplied by the number of applicators.

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: NON-HEATSET OFFSET PRINTING HAS 5% FLASH OFF (95% OF THE VOC IS RETAINED IN THE SUBSTRATE), HEATSET HAS 80% FLASH OFF.
OTHER TYPES OF PRINTERS HAVE 100% FLASH OFF.